

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE LOWER MANHATTAN
DISASTER SITE LITIGATION

21 MC102 (AKH)

NOTICE TO PRODUCE DOCUMENTS
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 34

To: Blackmon-Mooring-Steamatic Catastrophe, Inc. d/b/a BMS CAT
c/o Frank J. Keenan, Esq.
Methfessel & Werbel, PC
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New York, NY 10123
keenan@methwerb.com

PLEASE TAKE NOTICE, pursuant to Rule 34 of the Federal Rules of Civil Procedure, Gregory J. Cannata & Associates, attorneys for plaintiffs in the above-captioned matter, requests the above referenced defendant to respond within thirty (30) days to the following demands for document production with reference to 200 Vesey Street, 3WFC, as referenced in the deposition of John Elliott, dated October 4, 2012, on or about each page listed below. To the extent records were already exchanged, please provide the bates numbers of the requested record(s) on Merrill Lextranet.

1. Documents related to job NL 1423 and records related to any other jobs BMS CAT engaged in at 200 Vesey Street, 3WFC, including the two jobs previously referenced in the defendant's discovery response; jobs 1349, the AMEX and 1423 the Akibia to the extent, as referenced on or about page 155 in the above referenced deposition.

Plaintiffs reserve their rights to supplement this Notice and/or service additional Notices throughout the course of this litigation

Dated: New York, New York
February 27, 2013

GREGORY J. CANNATA & ASSOCIATES
Plaintiffs- Liaison Counsel

By: _____


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